

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

BRAD AMOS.)	
)	
Plaintiff,)	
)	
v.)	Case No. 3:21-cv-923
)	Judge Richardson
THE LAMPO GROUP, LLC, et al.,)	Magistrate Judge Holmes
)	
Defendants.)	

MOTION TO ALTER OR AMEND CASE MANAGEMENT ORDER

Comes now the Plaintiff and requests this court amend the Initial Case Management Order entered March 14, 2022. (Doc 26).

Plaintiffs request the deadlines for expert witnesses be amended so that the party who bears a burden on an issue must identify and disclose all expert witnesses and expert reports as to that issue on or before October 31, 2022. The party contesting said issue must identify and disclose expert witnesses and reports on or before November 30, 2022.

Currently the deadline for expert witness deposition is set for February 15, 2023. This date would not need to be amended.

In support, Plaintiff would show discovery in this matter has been ongoing. A few disputes have arisen between the parties involving written discovery responses and the protective order entered. So far, the parties have been able to resolve these disputes without court intervention, but the time taken to resolve them has contributed to the need for this request.

No deadline other than the ones specifically requested in this Motion would need to be amended and the dispositive motion deadline and trial date would not need to be changed.

Plaintiff has conferred with Defendant's counsel, and Defendant's counsel opposes this motion.

Respectfully Submitted,

**THE EMPLOYMENT AND CONSUMER LAW
GROUP**

/s/ JONATHAN A. STREET

**JONATHAN A. STREET, BPR No. 021712
BRANDON HALL, BPR No. 034027
LAUREN IRWIN, BPR No. 038433**
1720 West End Ave., Ste 402
Nashville, TN 37203
(615) 850-0632

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing was served via the Court's electronic filing system this 13th day of September, 2022 to the following:

Leslie Goff Sanders (TN #18973)
Daniel Crowell (TN #31485)
JACKSON LEWIS P.C.
CitySpace
611 Commerce Street
Suite 3102
Nashville, TN 37203
Telephone: (615) 915-3300
leslie.sanders@jacksonlewis.com
daniel.crowell@jacksonlewis.com

Attorneys for Defendants

/s/ Jonathan A. Street

Jonathan A. Street